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Attorneys for Petitioner  
LAHAINA PARASAIL, INC.

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF HAWAII**

In the Matter ) CIVIL NO. 04-00740 DAE/LEK  
                )  
of                 )  
                )  
The Complaint of PETITIONER     ) IN ADMIRALTY  
LAHAINA PARASAIL, INC., a         )  
Hawaii corporation, regarding Motor  
Vessel RED NORDIC, Official      )  
Number HA 1056 CP for exoneration  
from or limitation of liability,     )  
                )  
Petitioner-Counterclaimant.         )  
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**REQUEST FOR ENTRY OF DEFAULT AGAINST  
COUNTERCLAIM DEFENDANT PAUL E LEE**

Comes now Petitioner-Counterclaimant Lahaina Parasail, Inc., by its attorneys, Jill Anne Hillman, Esq. of Monroe and Zinder, and Roy Y. Yempuku, Esq., and hereby requests the clerk to enter default against Counterclaim Defendant Paul E. Lee for failure to plead or otherwise defend. Petitioner-Counterclaimant's motion is made pursuant to FRCP Rule 55(a) & (d) and based upon the Declaration of Counsel and Exhibit "A" attached hereto and incorporated by reference herein.

Dated: Honolulu, Hawaii March 24, 2006.

/s/ ROY Y. YEMPUKU  
MATTHEW W. MONROE  
JILL ANNE HILLMAN  
Attorneys for PETITIONER  
LAHAINA PARASAIL, INC.

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In the Matter of The Complaint of PETITIONER LAHAINA PARASAIL, INC., a Hawaii corporation, regarding Motor Vessel RED NORDIC, Official Number HA 1056 CP for exoneration from or limitation of liability, CIVIL NO. 04-00740 DAE/LEK

*Request for Entry of Default Against Counterclaim Defendant Paul E. Lee; Declaration of Counsel; Exhibit "A"; Entry of Default; Certificate of Service*